

RECEIVED  
CENTRAL FAX CENTER

JUL 27 2006

## REMARKS

In response to the Office Action dated April 28, 2006, Applicants respectfully request reconsideration based on the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Embodiments of the invention provide for enabling an outside entity to control devices at a location. In the exemplary embodiment of Figure 3, an internal computer system 310 can detect triggering events and establish a communication session with an outside entity 390 over a public network 106. Using a public network 106 allows existing infrastructure to be used in the system thereby facilitating installation and implementation of the system

Claims 31-42 and 44 were rejected under 35 U.S.C. 102(e) as being unpatentable by Amini. This rejection is traversed for the following reasons.

In applying Amini, it appears that the Examiner is construing the client site 310 to correspond to the claimed location and the viewing site 320 to correspond to the claimed outside entity. Applicants do not contest this interpretation of Amini.

Amini, however, lacks certain features of claim 31. For example, claim 31 recites, *inter alia*, "wherein when the sensing apparatus detects the triggering event the internal computer system establishes a communication session with the outside entity via a public communications network in direct communication with the location, the public communications network including at least one of a public switched telephone network and a wireless communication link." As described on page 21, line 19 to page 22, line 8, embodiments of the invention establish communication with an outside entity using at least one public communication network. Amini fails to teach this feature.

Amini uses a private network 340 to establish communications between the client site 310 and the off-site storage site 330. The private network 340 is directly connected to the client site. As taught by Amini, the private network increases security features. Amini contrasts the private network 340 with conventional dial up networks in prior art Figure 2 (column 6, lines 13-33). Thus, Amini fails to teach "the internal computer system establishes a communication session with the outside entity via a public communications network in direct communication with the location, the public communications network including at

least one of a public switched telephone network and a wireless communication link" as recited in claim 31.

It is noted that the rejection is under 35 U.S.C. § 102(e) and therefore Amini must teach all the elements of claim 31. In this situation, Amini does not teach a private network in direct communication with the location (client site 310). Rather, Amini teaches a private network 340 in direct communication with client site 310. Amini cannot anticipate claim 31 given this difference.

For at least the above reasons, claim 31 is patentable over Amini. Claims 32-34 depend from claim 31 and are patentable over Amini for at least the reasons advanced with reference to claim 31.

Independent claims 36 and 41 recite features similar to those discussed above with reference to claim 31. Claims 37-40 depend from claim 36 and claims 42 and 44 depend from claim 41. Thus, claims 36-42 and 44 are patentable over Amini for at least the reasons advanced with reference to claim 31.

Claim 45 was rejected under 35 U.S.C. § 103 as being unpatentable over Amini in view of Vaios. This rejection is traversed for the following reasons.

Claim 45 recites "wherein the triggering event is a call from a voice-over-Internet-protocol (VOIP) device." It is important to note that the triggering event is a VOIP call. Claim 45 depends on claim 41, which recites "reporting a triggering event associated with the situation at the location to the outside entity." Thus, the language of claim 45 does not simply recite the ability to make a VOIP call over the system. The VOIP call in claim 45 is a triggering event, which is reported to the outside entity that leads to subsequent steps in claim 41.

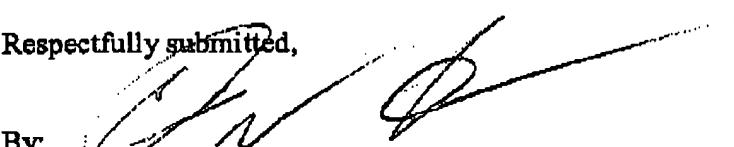
The Examiner relies on Vaios as allegedly disclosing a call from a VOIP device as a triggering event. Vaios discloses TCP/IP communications between the remote site and the monitoring site, but does not teach or suggest VOIP. Further, there is no teaching in Vaios that a VOIP call is a triggering event, which leads to the processing recited in claim 41. Assuming, arguendo, that there is some teaching of establishing a VOIP call, there is no teaching that the VOIP call serves as a triggering event. The triggering events in Amini are events detected by sensors or time periods. Thus, even if Amini and Vaios are combined, the features of claim 45 do not result.

For at least the above reasons, claim 45 is patentable over Amini in view of Vaios.

For at least the reasons advanced above, it is respectfully submitted that the application is in condition for allowance. Accordingly, reconsideration and allowance of the claims are respectfully requested. The Examiner is cordially requested to telephone, if the Examiner believes that it would be advantageous to the disposition of this case.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment, which may be required for this amendment, to Deposit Account No. 06-1130. In the event that an extension of time is required, or may be required in addition to that requested in any petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 06-1130.

Respectfully submitted,

By: 

David A. Fox  
Registration No. 38,807  
CANTOR COLBURN LLP  
55 Griffin Road South  
Bloomfield, CT 06002  
Telephone (860) 286-2929  
Facsimile (860) 286-0115  
Customer No. 36192

Date: July 27, 2006

Attorney Docket No. BLL-0226  
BellSouth No. 00027B

4